EXHIBIT 4

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NOVO NORDISK INC.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

In Re: INCRETIN-BASED THERAPIES PRODUCTS LIABILITY LITIGATION, *As to All Related and Member Cases*	Case No. 3:13-md-02452-AJB-MDD **DEFENDANT NOVO NORDISK INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' GENERAL CAUSATION REQUESTS TO PRODUCE TO DEFENDANT NOVO NORDISK, INC.** Judge: Hon. Anthony J. Battaglia Magistrate: Hon. Mitchell D. Dembin

Defendant Novo Nordisk Inc. ("NNI"), for itself alone and for no other defendant, pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure,

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hereby objects and responds to Plaintiffs' General Causation Requests to Produce to Defendant Novo Nordisk Inc. as follows:

PRELIMINARY STATEMENT

In accordance with F.R.C.P. 26 and Case Management Orders entered in this litigation, including the ESI Order, NNI has undertaken a reasonable search for documents responsive to these Requests. In addition to any documents or information referenced below in the responses to these Requests, NNI will produce non-privileged responsive documents from the custodial files for the key custodians relevant to general causation issues using agreed-upon search terms to cull documents from these custodians. Those key custodians are:

(1) Michelle Thompson, Senior Director – Regulatory Affairs – Therapeutic Area;

(2) Jason H. Brett, M.D., Senior Medical Director – Medical Affairs Diabetes;

(3) Alan C. Moses, M.D., Senior Vice President and Global Chief Medical Officer;

(4) Kathryn A. Owen, Vice President – Clinical Trial Management;

(5) Michael Sacco, Senior Director – Product Safety;

(6) Liselotte ("Lotte") Bjerre Knudsen, Ph.D., Senior Principal Scientist – Diabetes Pharmacology & Bioanalysis; and

(7) Yizhen Xu, M.D., Ph.D., Director – Clinical Research.

GENERAL OBJECTIONS

1. NNI is willing to discuss any of the following Objections and Responses in order to resolve disputes or provide clarification to the Responses below.

2. NNI objects to Plaintiffs' "Definitions and Instructions" to the extent such definitions and instructions, as incorporated into the Requests, render the

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Requests vague, ambiguous, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

3. NNI objects to these Requests to the extent they seek documents or information protected by the attorney-client privilege, the attorney work-product doctrine, the consulting expert exemption, the exemption protecting communications passing between agents of a party conducting an investigation in connection with litigation, or any other applicable privilege or exemption from discovery. The inadvertent production of any document protected by privilege, or the production of which is otherwise objected to in these responses and objections, is not intended to constitute, and shall not constitute, a waiver in whole or in part of such privilege or objection.

4. NNI objects to the Requests to the extent they seek confidential, proprietary, competitively sensitive or trade secret information. To the extent NNI produces responsive and non-privileged documents, any such documents that contain confidential, proprietary, competitively sensitive and/or trade secret information will be produced in accordance with the agreed-upon and Court-ordered Protective Order entered in these cases.

5. NNI objects to the Requests to the extent they seek third-party private, confidential, proprietary, competitively sensitive or trade secret information which information has been maintained in confidence and may be subject to contractual or court-ordered limitations on disclosure. To the extent NNI produces such information, it will be produced in accordance with the agreed-upon and Court-ordered Protective Order entered in this litigation.

6. NNI objects to the Requests to the extent responsive information may be subject to the limitations of foreign privacy laws or other applicable laws. NNI objects to the Requests to the extent they seek patient information that is required to be withheld by state, federal, and/or foreign law, including, but not limited to, 21 C.F.R. § 20.63(f).

7. NNI objects to the Requests to the extent they contract, expand, or otherwise interfere with the rights and duties of the parties under the existing Orders, including, but not limited to, Case Management Orders, Pre-Trial Orders, and Minute Orders, governing this litigation.

8. NNI objects to these Requests to the extent they seek documents related to foreign regulatory submissions, requirements, or activities, or the direction of foreign regulatory bodies, other than the EMA, as described herein, because such documents are neither relevant nor reasonably calculated to led to the discovery of admissible evidence and are unduly burdensome to produce. Such information is subject to different regulatory and legal standards and requirements, and can be influenced by political, cultural, and social differences, including, but not limited to, differences in the practice of medicine. NNI agrees to produce the EMA regulatory communications and submissions files for Victoza® only under the unique and specific facts of this case, namely, that NNI relies upon the EMA's July 2013 Assessment and the FDA and EMA's February 2014 Assessment as it relates to general causation. NNI maintains its position that regulatory filings with foreign agencies are irrelevant to product liability actions in the United States and should not generally be produced in these litigations.

9. Any response to a Request shall not be construed as a concession or admission that any response, testimony, or document related thereto is relevant or otherwise admissible in this action, nor shall any response constitute or be construed as a waiver of any objection to the admissibility of such response, testimony, or document related thereto.

10. The foregoing General Objections are specifically and expressly incorporated in each and every one of the Responses herein and the reassertion or specification of any of these General Objections or the assertion of other objections in no way implies a failure to assert each and every General Objection.

REQUESTS TO PRODUCE

REQUEST NO. 1:

The DOCUMENTS identified in YOUR answers to Plaintiffs' General Causation Interrogatories to Defendant Novo Nordisk, Inc.

RESPONSE TO REQUEST NO. 1:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI objects to this Request as overly broad, vague, and ambiguous. NNI further objects to this Request to the extent it seeks confidential, proprietary, competitively sensitive, or trade secret information. To the extent NNI produces responsive and non-privileged documents, any such documents that contain confidential, proprietary, competitively sensitive, and/or trade secret information will be produced in accordance with the agreed-upon and Court-ordered Protective Order entered in these cases.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI will produce non-privileged documents responsive to this Request, as specified in NNI's responses to Plaintiffs' General Causation Interrogatories and more fully below, and in accordance with the deadlines ordered by the Court.

REQUEST NO. 2:

The IND/NDA and any SNDAs for VICTOZA in native electronic searchable format as maintained by YOU.

RESPONSE TO REQUEST NO. 2:

NNI incorporates, as if fully set forth herein, the General Objections by reference. Subject to and without limiting or otherwise waiving the foregoing General Objections, NNI refers Plaintiffs to its production of IND and NDA files dated through February 28, 2014, produced at Bates-ranges NNI-IND-61040-00000001 – NNI-IND-61040-00060258 and NNI-NDA-22341-00000001 – NNI-NDA-22341-01384489. NNI's production includes SNDAs for Victoza®. NNI

further states that the IND and NDA productions have been produced in accordance with the agreed-upon November 15, 2013 ESI Order, with an index and in a searchable format.

REQUEST NO. 3:

All other correspondence, data and other DOCUMENTS that YOU provided to or received from the FDA related to the safety of VICTOZA with respect to pancreatitis and/or pancreatic cancer, which are not part of the IND/NDA or any SNDAs for VICTOZA.

RESPONSE TO REQUEST NO. 3:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "all" correspondence, data, and documents.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI states that it maintains IND and NDA files, which are the official repositories for communications with and submissions to the FDA regarding the safety of Victoza®. NNI produced its IND and NDA files and refers Plaintiffs to its response to Request No. 2.

PERSONS WITH DISCOVERABLE INFORMATION ON GENERAL CAUSATION ISSUES

REQUEST NO. 4:

Corporate organization charts that identify the persons with supervisory responsibility over scientific research into the safety of VICTOZA and those working at their direction; the persons responsible for determining whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer and those working at their direction; the persons in charge of compiling and reporting pancreatitis and/or pancreatic cancer ADVERSE EVENTS for VICTOZA and those working at their direction; and the persons in charge of maintaining the source

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DOCUMENTS for pancreatitis and/or pancreatic cancer ADVERSE EVENTS for VICTOZA and those working at their direction.

RESPONSE TO REQUEST NO. 4:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request because it fails to define certain terms and phrases, including "supervisory" and "in charge." NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to its production of Organizational Charts bearing the Bates-prefix "NNI-OrgCharts."

PRECLINICAL, NONCLINICAL AND ANIMAL STUDIES REQUEST

REQUEST NO. 5:

A complete list of all VICTOZA preclinical, nonclinical and/or animal studies performed, completed, designed, planned and/or contemplated, identifying them by name, number or any other designation YOU use to identify them.

RESPONSE TO REQUEST NO. 5:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "planned" and "contemplated." NNI further objects to this Request to the extent it requests information about Victoza® preclinical, nonclinical, and/or animal studies that have not been performed, completed, or designed by NNI.

Subject to and without waiving the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's production of its Nonclinical Study Chart and its supplements, reflecting the Bates prefix "NNI-StudyCharts," which identify and describe preclinical, nonclinical, and/or animal studies conducted by Novo Nordisk on Victoza® that have been identified after reasonable inquiry.

REQUEST NO. 6:

For each VICTOZA preclinical, nonclinical and/or animal study performed, completed, designed, planned and/or contemplated, produce the following:

a. The protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; reports; and pancreatic specimens (e.g. histology slides, tissue samples, etc.) for that study;

b. The database(s) where the above information can be located; and

c. If an independent investigator, contract research organization, or other third party was involved in the study, produce all documents relating to the work performed, including but not limited to contracts and communications between YOU and said independent investigator, contract research organization, or other third party.

RESPONSE TO REQUEST NO. 6:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "planned" and "contemplated." NNI further objects to this Request to the extent it requests information about Victoza® preclinical, nonclinical, and/or animal studies that have not been performed, completed, or designed by Novo Nordisk. NNI further objects to this Request to the extent it seeks the production of databases because NNI cannot produce "databases," but only the data and information within them. NNI further objects to this Request to the extent it seeks information about NNI's relationship with various third parties, including contracts, which are outside the scope of general causation discovery pursuant to this Court's February 18 Order, which requires Plaintiffs to "narrow all discovery related requests to issues involving general causation."

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's production of its Nonclinical Study Chart and supplements, as described in NNI's response to

Request No. 5. NNI also produced, and referenced by Bates-number, the corresponding final report and protocol, where available, for each study identified in the study chart. NNI will supplement its production, in accordance with the deadlines ordered by the Court, with any outstanding final study reports and study protocols maintained in the normal and ordinary course of business that correspond to the studies listed on NNI's Nonclinical Study Chart.

NNI further states that laboratory notebooks and raw data, including, but not limited to, notes, logs, bench notes, books, computer files, results, and pancreatic specimens (e.g., histology slides, tissue samples, etc.) for completed and ongoing preclinical, nonclinical, and/or animal studies conducted by Novo Nordisk on Victoza® are maintained in accordance with regulatory standards by the Contract Research Organization ("CRO") that performed the study. The identity of the CRO can be found in the study report corresponding to each study. NNI will meet and confer about providing inspection of these materials and data, if needed, at the request of Plaintiffs.

REQUEST NO. 7:

The standard operating procedures and/or policy and procedures manuals for VICTOZA preclinical, nonclinical and animal studies.

RESPONSE TO REQUEST NO. 7:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome. NNI further objects to this Request to the extent it suggests that there are standard operating procedures ("SOPs") and/or policy and procedures manuals specific to Victoza® preclinical, nonclinical, and animal studies.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI states that responsive documents may be found within NNI's SOP production, reflecting the Bates prefix "NNI-SOP." As part of that

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production, NNI produced an index of Nonclinical SOPs and produced the SOPs from that index as requested by Plaintiffs.

REQUEST NO. 8:

Every DOCUMENT that addresses the significance of any preclinical, nonclinical and/or animal study in relation to whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 8:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "every" document. NNI further objects to this Request as vague and ambiguous because it fails to define key terms, including "significance." NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it seeks documents related to preclinical, nonclinical, and/or animal studies not conducted by Novo Nordisk on Victoza®. NNI further objects to this Request to the extent it seeks documents not maintained by NNI in the regular and ordinary course of business. NNI further objects to this Request to the extent it seeks documents regarding foreign regulatory activities.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive information can be found, to the extent it exists, in submissions to the FDA which are located within NNI's IND and NDA files for Victoza®, as identified in NNI's response to Request No. 2. NNI further states that responsive non-privileged documents can be found, to the extent they exist, in custodial files for key custodians, including, but not limited to, Lotte Knudsen, Jason Brett, and Alan Moses.

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REQUEST NO. 9:

The memoranda, reports and other similar DOCUMENTS that describe the nature and intended purpose of any preclinical, nonclinical and/or animal studies involving VICTOZA that are not yet started or completed and, to the extent such DOCUMENTS exist, the protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; reports; and pancreatic specimens (e.g. histology slides, tissue samples, etc.) for each such preclinical, nonclinical and/or animal study.

RESPONSE TO REQUEST NO. 9:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous because it fails to define key terms, including "similar" and "not yet started." NNI further objects to this Request to the extent it seeks documents related to preclinical, nonclinical, and/or animal studies not currently being planned and/or conducted by Novo Nordisk on Victoza®. NNI further objects to this Request to the extent it seeks documents not maintained by NNI in the regular and ordinary course of business. NNI further objects to this Request to the extent it seeks documents regarding foreign regulatory activities.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's production of its Nonclinical Study Chart and supplements, as described in NNI's responses to Request Nos. 5 and 6, which includes information on approved, but not yet started, preclinical, nonclinical, and/or animal studies for Victoza® to the extent they exist.

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HUMAN STUDIES

REQUEST NO. 10:

A complete list of all VICTOZA human studies performed, completed, designed, planned and/or contemplated, identifying them by name, number or any other designation YOU use to identify them.

RESPONSE TO REQUEST NO. 10:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "planned" and "contemplated." NNI further objects to this Request to the extent it requests information about Victoza® human studies that have not been performed, completed, or designed by NNI.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's production of its Clinical Study chart and supplements, reflecting Bates prefix "NNI-StudyCharts," which identify and describe human studies conducted by Novo Nordisk on Victoza® identified after reasonable inquiry.

REQUEST NO. 11:

For each VICTOZA human study performed, completed, designed, planned and/or contemplated, produce the following:

a. The protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; reports; and pancreatic specimens (e.g. histology slides, tissue samples, etc.) for that study;

b. The database(s) where the above information can be located;

c. All documentation and/or communication regarding sponsorship of the study; and

d. If an independent investigator, contract research organization, or other third party was involved in the study, produce all documents relating to the work performed, including but not limited to contracts and communications between

YOU and said independent investigator, contract research organization, or other third party.

RESPONSE TO REQUEST NO. 11:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "planned," "contemplated," and "database." NNI further objects to this Request to the extent it requests information about Victoza® human studies that have not been conducted or are not being conducted by Novo Nordisk. NNI further objects to this Request to the extent it seeks the production of databases because NNI cannot produce "databases," but only the data and information within them. NNI further objects to this Request to the extent it seeks information, including information about NNI's relationships or contracts with various third parties, that is outside the scope of general causation discovery and inapplicable discovery at this time pursuant to this Court's February 18 Order, which requires Plaintiffs to "narrow all discovery related requests to issues involving general causation."

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's production of its Clinical Study Chart and supplements, as described in NNI's response to Request No. 10. NNI also produced, and referenced by Bates-number, the corresponding final report, protocol, and dataset, where available, for each study identified in the study chart. NNI will supplement its production, in accordance with the deadlines ordered by the Court, with any outstanding final study reports, protocols, and datasets maintained in the normal and ordinary course of business that correspond to the studies listed on NNI's Clinical Study Chart.

NNI further states that patient level data for Victoza® human studies conducted by Novo are maintained in accordance with regulatory standards in the Trial Master File. NNI objects to producing its Trial Master File for every human

study on Victoza® because the significant burden imposed on producing the information would far outweigh the information's limited relevance. NNI will meet and confer with Plaintiffs about making this information available, if needed, for specific studies upon request.

REQUEST NO. 12:

The standard operating procedures and/or policy and procedures manuals for VICTOZA human studies.

RESPONSE TO REQUEST NO. 12:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent it suggests that there are standard operating procedures ("SOPs") and/or policy and procedures manuals specific to Victoza®. NNI further objects to this Request as overly broad and unduly burdensome.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI states that responsive documents may be found within NNI's SOP production, reflecting the Bates prefix "NNI-SOP." As part of that production, NNI produced an index of CMR (Clinical, Medical, Regulatory) SOPs and asked that Plaintiffs request the specific SOPs they would like produced. Additionally, NNI's SOP production includes the training profile index for Kathryn Owen, and NNI produced specific SOPs identified in that index as requested by Plaintiffs.

REQUEST NO. 13:

Every DOCUMENT that records, analyzes or discusses information about each person YOU are aware of who was a participant in a VICTOZA human study and was diagnosed with pancreatitis and/or pancreatic cancer either while still participating in the study or after withdrawing or otherwise being removed from the study.

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RESPONSE TO REQUEST NO. 13:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "records," "analyzes," or "discusses." NNI further objects to producing "every" document on the requested topic as it is unduly burdensome. NNI further objects to this Request to the extent it requires NNI disclose the identity of any individuals not named as Plaintiffs in this litigation who allegedly experienced or reported a diagnosis of pancreatitis and/or pancreatic cancer as such disclosure would violate the patients' or reporters' right to confidentiality under federal law.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's adverse event production, reflecting the Bates-prefix "NNI-AER," which includes adverse event case reports run from NNI's Argus database for global Victoza® adverse events of pancreatic cancer and pancreatitis through February 28, 2014 and a corresponding adverse event spreadsheet.

REQUEST NO. 14:

Every DOCUMENT that addresses the significance of any human study in relation to whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 14:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to producing "every" document on the requested topic as it is unduly burdensome. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "significance."

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Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's Clinical Study Chart and supplements; the corresponding study reports, protocols, and datasets, where available, identified on the study charts; the IND and NDA production; and the production of key custodial files, including, but not limited to, Alan Moses, Jason Brett, Lotte Knudsen, Kathryn Owen, and Yizhen Xu.

REQUEST NO. 15:

The memoranda, reports and other similar DOCUMENTS that describe the nature and intended purpose of any human studies involving VICTOZA that are not yet started or completed and, to the extent such DOCUMENTS exist, the study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; reports; and pancreatic specimens (e.g. histology slides, tissue samples, etc.) for each such human study.

RESPONSE TO REQUEST NO. 15:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "not yet started." NNI further objects to this Request to the extent it seeks documents related to human studies for Victoza® that are not being or will not be conducted by Novo Nordisk, if at all.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's production of its Clinical Study Chart and supplements, as described in NNI's responses to Request Nos. 10 and 11, which includes information on approved, but not yet started, human studies for Victoza® to the extent they exist.

OBSERVATIONAL STUDIES

REQUEST NO. 16:

A complete list of all VICTOZA observational studies (including, without limitation, claims database studies, cohort studies and other epidemiological

studies) performed, completed, designed, planned and/or contemplated, identifying them by name, number or any other designation YOU use to identify them.

RESPONSE TO REQUEST NO. 16:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "planned" and "contemplated." NNI further objects to this Request to the extent it requests information about Victoza® observational studies that have not been performed, completed, or designed by NNI.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's production of its Clinical Study chart and supplements, reflecting the Bates prefix "NNI-StudyCharts," which identify and describe observational studies conducted by Novo Nordisk on Victoza® identified after reasonable inquiry.

REQUEST NO. 17:

For each VICTOZA observational study (including, without limitation, claims database studies, cohort studies and other epidemiological studies) performed, completed, designed, planned and/or contemplated, produce the following:

a. The protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; and reports for that study;

b. The database(s) where the above information can be located; and

c. If an independent investigator, contract research organization, or other third party was involved in the study, produce all documents relating to the work performed, including but not limited to contracts and communications between YOU and said independent investigator, contract research organization, or other third party.

RESPONSE TO REQUEST NO. 17:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "planned," "contemplated," and "database." NNI further objects to this Request to the extent it requests information about Victoza® observational studies that have not been conducted or are not being conducted by Novo Nordisk. NNI further objects to this Request to the extent it seeks the production of databases because NNI cannot produce "databases," but only the data and information within them. NNI further objects to this Request to the extent it seeks information, including information about NNI's relationships or contracts with various third parties, that is outside the scope of general causation discovery and inapplicable discovery at this time pursuant to this Court's February 18 Order, which requires Plaintiffs to "narrow all discovery related requests to issues involving general causation."

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's production of its Clinical Study Chart and supplements, as described in NNI's response to Request No. 16. NNI also produced, and referenced by Bates-number, the corresponding final report, protocol, and dataset, where available, for each study identified in the study chart. NNI will supplement its production, in accordance with the deadlines ordered by the Court, with any outstanding final study reports, protocols and datasets maintained in the normal and ordinary course of business that correspond to the studies listed on NNI's Clinical Study Chart.

NNI further states that other data for Victoza® observational studies conducted by Novo are maintained in accordance with regulatory standards in the Trial Master File. NNI objects to producing its Trial Master File for every observational study on Victoza® because the significant burden imposed on producing the information would far outweigh the information's limited relevance.

NNI will meet and confer with Plaintiffs about making this information available, if needed, for specific studies upon request.

REQUEST NO. 18:

The standard operating procedures and/or policy and procedures manuals for VICTOZA observational studies (including, without limitation, claims database studies, cohort studies and other epidemiological studies).

RESPONSE TO REQUEST NO. 18:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent it suggests that there are standard operating procedures ("SOPs") and/or policy and procedures manuals specific to Victoza®. NNI further objects to this Request as overly broad and unduly burdensome.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to its response to Request No. 12.

REQUEST NO. 19:

Every DOCUMENT that addresses the significance of any observational studies (including, without limitation, claims database studies, cohort studies and other epidemiological studies) in relation to whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 19:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to producing "every" document on the requested topic as it is unduly burdensome. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "significance."

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's Clinical Study Chart and

supplements; the corresponding study reports, protocols, and datasets, where available, identified on the study charts; the IND and NDA production; and the production of key custodial files, including, but not limited to, Alan Moses, Jason Brett, Lotte Knudsen, Kathryn Owen, and Yizhen Xu.

REQUEST NO. 20:

The memoranda, reports and other similar DOCUMENTS that describe the nature and intended purpose of any observational studies (including, without limitation, claims database studies, cohort studies and other epidemiological studies) involving VICTOZA that are not yet started or completed and, to the extent such DOCUMENTS exist, the study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; and reports for each such study.

RESPONSE TO REQUEST NO. 20:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "not yet started." NNI further objects to this Request to the extent it seeks documents related to observational studies for Victoza® that are not being or will not be conducted by Novo Nordisk, if at all.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's production of its Clinical Study Chart and supplements, as described in NNI's responses to Request Nos. 10 and 11, which includes information on approved, but not yet started, observational studies for Victoza® to the extent they exist.

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STUDIES TO DETERMINE CAUSAL CONNECTION WITH PANCREATIC CANCER

REQUEST NO. 21:

The standard operating procedures and/or policy and procedures manuals for VICTOZA studies undertaken to determine, in whole or in part, whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 21:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it suggests that there are SOPs and/or policy and procedures manuals specific to Victoza®.

Without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive information, to the extent it exists, can be found within NNI's SOP production, reflecting the Bates-prefix "NNI-SOP."

REQUEST NO. 22:

The study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; and reports that were provided to the FDA for each study, test, investigation, evaluation and/or assessment undertaken by YOU for the purpose of determining, in whole or in part, whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 22:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's Nonclinical and Clinical Study Charts and supplements which identify and describe the studies conducted

by Novo Nordisk on Victoza® that have been identified after reasonable inquiry. NNI refers Plaintiffs to NNI's production of IND and NDA files for Victoza®, as identified in NNI's response to Request No. 2, which include the studies submitted to the FDA.

REQUEST NO. 23:

The study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; and reports that were not provided to the FDA for each study, test, investigation, evaluation and/or assessment undertaken by YOU for the purpose of determining, in whole or in part, whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 23:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's Nonclinical and Clinical Study Charts and supplements which identify and describe the studies conducted by Novo Nordisk on Victoza® that have been identified after reasonable inquiry. NNI refers Plaintiffs to NNI's production of IND and NDA files for Victoza®, as identified in NNI's response to Request No. 2, which include the studies submitted to the FDA. NNI further refers Plaintiffs to its responses to Request Nos. 6 and 11.

REQUEST NO. 24:

The study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; and reports that were provided to the EMA for each study, test, investigation, evaluation and/or assessment undertaken by YOU for the purpose of determining, in whole or in part, whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 24:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it requests information on what was, or was not, submitted to the EMA because it has no bearing on general causation issues in this litigation. NNI further objects to this Request to the extent it seeks information regarding NNI's regulatory submissions to the EMA that are duplicative of information submitted to the FDA.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's Nonclinical and Clinical Study Charts and supplements which identify and describe the studies conducted by Novo Nordisk on Victoza® that have been identified after reasonable inquiry. NNI further refers Plaintiffs to its responses to Request Nos. 6 and 11. NNI further states that documents submitted to the EMA can be found in the EMA regulatory files, which will be produced in this litigation through February 28, 2014 in searchable format and Plaintiffs will be in the same position as NNI to locate and identify any further responsive information within this category of documents. Data sets from the EMA regulatory files will be made available upon request to the extent that they have not already been produced from the FDA files or otherwise made available to Plaintiffs.

NNI agrees to produce the EMA files for Victoza® only under the unique and specific facts of this case, namely, that NNI relies upon the EMA's July 2013 Assessment and the FDA and EMA's February 2014 Assessment as it relates to general causation. NNI maintains its position that regulatory filings with foreign agencies are irrelevant to product liability actions in the United States and should not generally be produced in these litigations.

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REQUEST NO. 25:

The study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; and reports that were not provided to the EMA for each study, test, investigation, evaluation and/or assessment undertaken by YOU for the purpose of determining, in whole or in part, whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 25:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it requests information on what was, or was not, submitted to the EMA because what was submitted to the EMA has no bearing on general causation issues in this litigation. NNI further objects to this Request to the extent it seeks information regarding NNI's regulatory submissions to the EMA that are duplicative of information submitted to the FDA. NNI further objects to the extent this Request is duplicative of Request No. 24.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to its response to Request No. 24.

REQUEST NO. 26:

Every DOCUMENT that addresses the significance of any study, test, investigation, evaluation and/or assessment undertaken by YOU for the purpose of determining, in whole or in part, whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer, in relation to whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 26:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly

burdensome to the extent it seeks "every document." NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "significance." NNI objects to the Request to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's Clinical Study Chart and supplements; the corresponding study reports, protocols and datasets, where available, identified on the study charts; the IND and NDA production; and the production of key custodial files, including, but not limited to, Alan Moses, Jason Brett, Lotte Knudsen, Kathryn Owen, and Yizhen Xu.

REQUEST NO. 27:

The memoranda, reports and other similar DOCUMENTS that describe the nature and intended purpose of any study, test, investigation, evaluation and/or assessment undertaken by YOU for the purpose of determining, in whole or in part, whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer, that is not yet started or completed and, to the extent such DOCUMENTS exist, the study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; and reports for each such study, test, investigation, evaluation and/or assessment.

RESPONSE TO REQUEST NO. 27:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "not yet started." NNI further objects to this Request as being duplicative of Request Nos. 9, 15, and 20.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its responses to Requests Nos. 9, 15, and 20.

OTHER STUDIES

REQUEST NO. 28:

The standard operating procedures and/or policy and procedures manuals for all other studies YOU are aware of that bear, in whole or in part, on whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer (whether such study, test, investigation, evaluation and/or assessment involves VICTOZA, another GLP 1 receptor or DPP 4 inhibitor, any other drug, or no drug).

RESPONSE TO REQUEST NO. 28:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request as vague, ambiguous, overly broad, and unduly burdensome as it fails to define key terms, including "aware of." NNI further objects to this Request to the extent it suggests that there are SOPs and/or policy and procedures manuals specific to Victoza®. NNI further objects to this Request as overly broad and unduly burdensome. NNI objects to the Request to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine. NNI further objects to this Request to the extent it is duplicative of Request Nos. 7, 12, 18, and 21.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its responses to Request Nos. 7, 12, 18, and 21.

REQUEST NO. 29:

Every DOCUMENT that addresses the significance of any other study, test, investigation, evaluation and/or assessment YOU are aware of that bears, in whole

or in part, on whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer (whether such study, test, investigation, evaluation and/or assessment involves VICTOZA, another GLP 1 receptor or DPP 4 inhibitor, any other drug, or no drug), in relation to whether VICTOZA CAUSES pancreatic cancer.

RESPONSE TO REQUEST NO. 29:

NNI incorporates as if fully set forth herein the General Objections by Reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "every" document on this topic. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to the term "aware of" as overly broad and unduly burdensome. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "significance." NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI objects to the Request to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine. NNI further objects to this response to the extent it is duplicative of Request Nos. 8, 14, 19, and 26.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers to its responses to Request Nos. 8, 14, 19, and 26.

REQUEST NO. 30:

The memoranda, reports and other similar DOCUMENTS that describe the nature and intended purpose of any other study, test, investigation, evaluation and/or assessment YOU are aware of that bears, in whole or in part, on whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer (whether such study, test, investigation, evaluation and/or assessment involves VICTOZA, another GLP 1 receptor or DPP 4 inhibitor, any other drug, or no drug) that is not

yet started or completed and, to the extent such DOCUMENTS exist, the study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; reports; and pancreatic specimens (e.g., histology slides, tissue samples, etc.) for each such other study, test, investigation, evaluation and/or assessment.

RESPONSE TO REQUEST NO. 30:

NNI incorporates as if fully set forth herein the General Objections by Reference. NNI further objects to the term "aware of" as overly broad and unduly burdensome. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "not yet started." NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it seeks documents related to studies that have not been conducted and/or that are not currently being conducted by Novo Nordisk on Victoza®. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent it is duplicative of Request Nos. 9, 15, 20, and 27.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its responses to Request Nos. 9, 15, 20, and 27.

FDA AND EMA

REQUEST NO. 31:

The study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; reports; and pancreatic specimens (e.g., histology slides, tissue samples, etc.) that were provided to the FDA for any other study, test, investigation, evaluation and/or assessment YOU are aware of that bears, in whole or in part, on whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer (whether such study, test,

investigation, evaluation and/or assessment involves VICTOZA, another GLP 1 receptor or DPP 4 inhibitor, any other drug, or no drug).

RESPONSE TO REQUEST NO. 31:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms including "aware of." NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it seeks documents related to studies that have not been conducted and/or that are not currently being conducted by Novo Nordisk on Victoza®. NNI further objects to this Request as overly broad and unduly burdensome. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that its communications with and submissions to the FDA regarding studies on the safety of Victoza® can be found in NNI's IND and NDA production, as identified in NNI's response to Request No. 2.

REQUEST NO. 32:

The study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; reports; and pancreatic specimens (e.g., histology slides, tissue samples, etc.) that were not provided to the FDA for any other study, test, investigation, evaluation and/or assessment YOU are aware of that bears, in whole or in part, on whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer (whether such study, test, investigation, evaluation and/or assessment involves VICTOZA, another GLP 1 receptor or DPP 4 inhibitor, any other drug, or no drug).

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RESPONSE TO REQUEST NO. 32:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms including "aware of." NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it seeks documents related to studies that have not been conducted and/or that are not currently being conducted by Novo Nordisk on Victoza®. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks information from numerous sources that may be obtained from fewer sources. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI objects to this Request to the extent it is duplicative of Request No. 6, 11, and 23.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to NNI's Nonclinical and Clinical Study Charts and supplements which identify and describe the studies conducted by Novo Nordisk on Victoza® that have been identified after reasonable inquiry. NNI refers Plaintiffs to NNI's production of IND and NDA files for Victoza®, as identified in NNI's response to Request No. 2 that include the studies submitted to the FDA. NNI further refers Plaintiffs to its responses to Request Nos. 6, 11, and 23.

REQUEST NO. 33:

The study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; reports; and pancreatic specimens (e.g., histology slides, tissue samples, etc.) that were provided to the EMA for any other study, test, investigation, evaluation and/or assessment YOU are aware of that bears, in whole or in part, on whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer (whether such study, test,

investigation, evaluation and/or assessment involves VICTOZA, another GLP 1 receptor or DPP 4 inhibitor, any other drug, or no drug).

RESPONSE TO REQUEST NO. 33:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms including "aware of." NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it seeks documents related to studies that have not been conducted and/or that are not currently being conducted by Novo Nordisk. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI objects to this Request to the extent it is duplicative of Request No. 6, 11, and 24.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's Nonclinical and Clinical Study Charts and supplements which identify and describe the studies conducted by Novo Nordisk on Victoza® that have been identified after reasonable inquiry. NNI further refers Plaintiffs to its responses to Request Nos. 6,11, and 24.

REQUEST NO. 34:

The study protocols; data; researcher and/or laboratory technician notebooks, notes, logs, bench notes, books, computer files and emails; results; reports; and pancreatic specimens (e.g., histology slides, tissue samples, etc.) that were not provided to the EMA for any other study, test, investigation, evaluation and/or assessment YOU are aware of that bears, in whole or in part, on whether VICTOZA CAUSES and/or is capable of CAUSING pancreatic cancer (whether such study, test, investigation, evaluation and/or assessment involves VICTOZA, another GLP 1 receptor or DPP 4 inhibitor, any other drug, or no drug).

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RESPONSE TO REQUEST NO. 34:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms including "aware of." NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it seeks documents related to studies that have not been conducted and/or that are not currently being conducted by Novo Nordisk on Victoza®. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent it requests information on what was, or was not, submitted to the EMA because it has no bearing on general causation issues in this litigation. NNI further objects to this Request to the extent it seeks information regarding NNI's regulatory submissions to the EMA that are duplicative of information submitted to the FDA. NNI further objects to this Request to the extent it is duplicative of Request No. 33.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its response to Request No. 33.

REQUEST NO. 35:

All emails, letters, reports, memoranda and other written communications YOU have sent to or received from any governmental agency (including, without limitation, the FDA and EMA) or any other entity or person regarding whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer.

RESPONSE TO REQUEST NO. 35:

NNI incorporates the General Objections by reference as if fully set forth herein. NNI objects to this Request as overly broad and unduly burdensome to the extent it seeks "all" emails, letters, reports, memoranda, and other written communications from "any" governmental agency, entity, or person. NNI further

objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent it seeks documents regarding foreign regulatory activities. NNI objects to the Request to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine. NNI further objects to this Request to the extent it is duplicative of Request Nos. 2, 3, 22, 24, 31, and 33.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its responses to Request Nos. 2, 3, 22, 24, 31, and 33.

REQUEST NO. 36:

If any of YOUR employees, officers, directors, agents, contractors, key opinion leaders, members of speakers' bureaus, advisory board members, or scientific advisors corresponded with or supplied information or data to the European Medicines Agency (EMA) about or in connection with any assessments of whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatic cancer (including, without limitation, as reflected in the EMA's 2013 "Assessment report for GLP 1 based therapies" and its 2014 "Pancreatic Safety of Incretin Based Drugs FDA and EMA Assessment"), produce the correspondence, information or data, and any correspondence or other DOCUMENTS YOU received from the EMA in response.

RESPONSE TO REQUEST NO. 36:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define certain terms and phrases, including "key opinion leader," "member of speaker bureau," "advisory board member," and "scientific advisor," and "corresponded with or supplied information or data." NNI further objects to this Request to the extent it seeks information concerning non-NNI personnel. NNI further objects to this Request to the extent it seeks information regarding products

other than Victoza®. NNI further objects to this Request to the extent it requests information on what was, or was not, submitted to the EMA because it has no bearing on general causation issues in this litigation. NNI further objects to this Request to the extent it seeks information regarding NNI's regulatory submissions to the EMA that are duplicative of information submitted to the FDA.

Subject to or without waiving or otherwise limiting the foregoing General and Specific objections, NNI refers Plaintiffs to NNI's EMA regulatory files, which will be produced in this litigation through February 28, 2104. Data sets from the EMA regulatory files will be made available upon request to the extent that they have not already been produced from the FDA files or otherwise made available to Plaintiffs. NNI further refers Plaintiffs to the custodial file for Lotte Knudsen.

NNI agrees to produce the EMA files for Victoza® only under the unique and specific facts of this case, namely, that NNI relies upon the EMA's July 2013 Assessment and the FDA and EMA's February 2014 Assessment as it relates to general causation. NNI maintains its position that regulatory filings with foreign agencies are irrelevant to product liability actions in the United States and should not generally be produced in these litigations.

REQUEST NO. 37:

If any of YOUR employees, officers, directors, agents, contractors, key opinion leaders, members of speakers' bureaus, advisory board members, or scientific advisors corresponded with or supplied information or data to the FDA about or in connection with any assessments of whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatic cancer (including, without limitation, as reflected in the FDA's 2014 "Pancreatic Safety of Incretin Based Drugs FDA and EMA Assessment"), produce the correspondence, information or data, and any correspondence or other DOCUMENTS YOU received from the FDA in response.

RESPONSE TO REQUEST NO. 37:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define certain terms and phrases, including "key opinion leader," "member of speaker bureau," "advisory board member," and "scientific advisor," and "corresponded with or supplied information or data." NNI further objects to this Request to the extent it seeks information concerning non-NNI personnel. NNI further objects to this Request to the extent it seeks information regarding products other than Victoza®.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that its communications with and submissions to the FDA regarding studies on the safety of Victoza® can be found in NNI's IND and NDA production, as identified in NNI's response to Request No. 2. NNI further refers Plaintiffs to the custodial file for Michelle Thompson.

ADVERSE EVENTS

REQUEST NO. 38:

The standard operating procedures and/or policy and procedures manuals for the handling of pancreatitis and pancreatic cancer ADVERSE EVENTS and REPORTABLE EVENTS pertaining to VICTOZA.

RESPONSE TO REQUEST NO. 38:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI objects to this Request to the extent it suggests that there are SOPs and/or policy and procedures manuals specific to Victoza® adverse events. NNI further objects to this Request as overly broad and unduly burdensome.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI states that responsive documents may be found within NNI's SOP production, reflecting the Bates prefix "NNI-SOP." As part of that production and in addition to the SOPs produced relevant to adverse events, NNI

also produced an index of SOPs included in the training profile for Michael Sacco and asked that Plaintiffs request the specific SOPs they would like produced.

REQUEST NO. 39:

Produce in electronic format complete copies of all databases used to track, trend, or record information regarding pancreatitis and pancreatic cancer ADVERSE EVENTS that YOU associated with VICTOZA. To the extent that YOUR databases incorporate the following information for pancreatitis and pancreatic cancer ADVERSE EVENTS for VICTOZA, this Request includes:

a. All DOCUMENTS and information in YOUR possession regarding each ADVERSE EVENT;

b. Whether the ADVERSE EVENT was in the form of a MedWatch Report, communication from a medical provider or consumer, an ADVERSE EVENT REPORT ("AER") or some other form;

c. All attempts YOU made to communicate with anyone to gather further information regarding each ADVERSE EVENT;

d. All communications YOU made or received, including the substance of the communications, the identities of any persons YOU communicated with internally, and the identities of any persons YOU communicated with externally regarding each ADVERSE EVENT;

e. The nature and results of any investigations YOU conducted to determine the CAUSE of each ADVERSE EVENT, and/or the basis of any decisions not to investigate;

f. Any experts and/or consultants whom YOU contacted regarding any ADVERSE EVENT;

g. YOUR deliberations and decision making processes used to determine whether each ADVERSE EVENT was or was not a REPORTABLE EVENT;

h. Any action YOU took as a result of each ADVERSE EVENT;

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i. YOUR analysis and conclusions as to the nature, severity and frequency of each ADVERSE EVENT;

j. All ADVERSE EVENT report forms, including supplemental reports and related information, that were submitted to the FDA for each ADVERSE EVENT;

k. The current status or final disposition of each ADVERSE EVENT; and

1. Any reporting rates analysis and/or trending analysis done regarding each ADVERSE EVENT.

To the extent that YOUR databases do not incorporate some or all of the information referenced above in subparts a 1, produce the equivalent information by reference to the business records in which YOU store it.

RESPONSE TO REQUEST NO. 39:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent it seeks production of databases as NNI cannot produce "databases," but only data and information residing within them. NNI further objects to this Request as overly broad and unduly burdensome. NNI further objects to this Request to the extent it requests source files for adverse events, which are unduly burdensome and not relevant for general causation purposes. NNI further objects to this Request to the extent it requires NNI disclose the identity of any individuals not named as Plaintiffs in this litigation who allegedly experienced or reported a diagnosis of pancreatitis and/or pancreatic cancer as such disclosure would violate the patients' or reporters' right to confidentiality under federal law.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to NNI's adverse event production, reflecting the Bates-prefix "NNI-AER," which includes adverse event case reports run from NNI's Argus database for global Victoza® adverse events of pancreatic cancer and pancreatitis through February 28, 2014 and a corresponding adverse

event spreadsheet. NNI further refers Plaintiffs to NNI's production of IND and NDA files for Victoza®, as identified in NNI's response to Request No. 2. NNI further refers Plaintiffs to the custodial file of Michael Sacco.

REQUEST NO. 40:

The complete file that YOU established and maintain in response to each individual pancreatitis and pancreatic cancer ADVERSE EVENT for VICTOZA (commonly known as "source files," ADVERSE EVENT report files, backup files, or files containing source documentation related to ADVERSE EVENTS). This request seeks the production of all DOCUMENTS and information contained or discussed in the source files for each ADVERSE EVENT, which should contain most or all of the DOCUMENTS and information described in the preceding request in subparts a-1.

RESPONSE TO REQUEST NO. 40:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome. NNI further objects to this Request to the extent it requests source files for adverse events, which are unduly burdensome and not relevant for general causation purposes. NNI further objects to this Request to the extent it requires NNI disclose the identity of any individuals not named as Plaintiffs in this litigation who allegedly experienced or reported a diagnosis of pancreatitis and/or pancreatic cancer as such disclosure would violate the patients' or reporters' right to confidentiality under federal law. NNI further objects to this Request as it seeks information duplicative of that sought in Request No. 39.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its response to Request No. 39.

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REQUEST NO. 41:

To the extent not already produced in response to the preceding requests, produce all DOCUMENTS for each pancreatitis and pancreatic cancer REPORTABLE EVENT for VICTOZA, including the following:

a. All DOCUMENTS and information in YOUR possession regarding each REPORTABLE EVENT;

b. Whether the REPORTABLE EVENT was in the form of a MedWatch Report, communication from a medical provider or consumer, an ADVERSE EVENT REPORT ("AER") or some other form;

c. All attempts YOU made to communicate with anyone to gather further information regarding each REPORTABLE EVENT;

d. All communications YOU made or received, including the substance of the communications, the identities of any persons YOU communicated with internally, and the identities of any persons YOU communicated with externally regarding each REPORTABLE EVENT;

e. The nature and results of any investigations YOU conducted to determine the CAUSE of each REPORTABLE EVENT, and/or the basis of any decisions not to investigate;

f. Any experts and/or consultants whom YOU contacted regarding any REPORTABLE EVENT;

g. YOUR deliberations and decision making processes used to determine whether each underlying ADVERSE EVENT was or was not a REPORTABLE EVENT;

h. Any action YOU took as a result of each REPORTABLE EVENT;

i. YOUR analysis and conclusions as to the nature, severity and frequency of each REPORTABLE EVENT;

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j. All REPORTABLE EVENT report forms, including supplemental reports and related information, that were submitted to the FDA for each REPORTABLE EVENT;

k. The current status or final disposition of each REPORTABLE EVENT; and

1. Any reporting rates analysis and/or trending analysis done regarding each REPORTABLE EVENT.

RESPONSE TO REQUEST NO. 41:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome. NNI further objects to this Request to the extent it requests source files for adverse events, which are unduly burdensome and not relevant for general causation purposes. NNI further objects to this Request to the extent it requires NNI disclose the identity of any individuals not named as Plaintiffs in this litigation who allegedly experienced or reported a diagnosis of pancreatitis and/or pancreatic cancer as such disclosure would violate the patients' or reporters' right to confidentiality under federal law. NNI further objects to this Request as it seeks information duplicative of that sought in Request No. 39.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its response to Request No. 39.

REQUEST NO. 42:

All DOCUMENTS that state or discuss any request by the FDA that YOU conduct post market surveillance of VICTOZA with respect to pancreatitis and pancreatic cancer. Include in your response any correspondence, plans, reports, or other DOCUMENTS submitted by YOU to the FDA in response.

RESPONSE TO REQUEST NO. 42:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly

burdensome to the extent it seeks "all" documents on this topic. NNI objects to the Request to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to NNI's adverse event production, reflecting the Bates-prefix "NNI-AER," which includes adverse event case reports run from NNI's Argus database for global Victoza® adverse events of pancreatic cancer and pancreatitis through February 28, 2014 and a corresponding adverse event spreadsheet. NNI refers Plaintiffs to its IND and NDA productions as identified in NNI's response to request No. 2. NNI further refers Plaintiffs to the custodial files of Michael Sacco and Michelle Thompson for responsive information, to the extent it exists.

REQUEST NO. 43:

All charts, graphs, schematics, reports, memoranda and other similar DOCUMENTS analyzing, summarizing and/or reporting on pancreatitis and/or pancreatic cancer ADVERSE EVENTS for VICTOZA, including all such DOCUMENTS that compare VICTOZA to any other therapeutic agent(s) for the treatment of type 2 diabetes. To the extent that such DOCUMENTS were prepared in color, they should also be produced in color.

RESPONSE TO REQUEST NO. 43:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "all" documents on this topic.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive information may be found, to the extent it exists, in NNI's adverse event production, reflecting the Bates-prefix "NNI-AER," which includes adverse event case reports run from NNI's Argus database for global Victoza® adverse events of pancreatic cancer and pancreatitis

through February 28, 2014 and a corresponding adverse event spreadsheet; NNI's IND and NDA productions; and the custodial files of key witnesses, including, but not limited to, Michael Sacco, Alan Moses, Jason Brett, and Michelle Thompson.

REQUEST NO. 44:

All reports, memoranda and other DOCUMENTS that list and/or explain the criteria YOU use to determine whether any particular pancreatitis and/or pancreatic cancer ADVERSE EVENT is related to the patient's use of VICTOZA.

RESPONSE TO REQUEST NO. 44:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "all" documents on this topic. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific objections, NNI states that responsive documents may be found within NNI's SOP production, including but not limited to "Handling of Adverse Events and Other Safety Information" and "Filing of Adverse Events and Other Safety Information in Argus," reflecting the Bates-prefix "NNI-SOP." NNI further states that responsive information may be found, to the extent it exists, within the custodial files of key custodians, including, but not limited to, Michael Sacco, Alan Moses, and Jason Brett.

REQUEST NO. 45:

All medical and scientific literature that YOUR company has identified that relates to the association between VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor and pancreatitis and/or pancreatic cancer.

RESPONSE TO REQUEST NO. 45:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly

burdensome to the extent it seeks "all" medical and scientific literature. NNI further objects to the extent this Request calls for information either not within NNI's possession, custody, or control and/or information that is a matter of public record or otherwise as accessible to Plaintiffs as to NNI. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to Appendix A to NNI's Interrogatory Objections and Responses which lists the medical literature regarding Victoza® that is centrally stored in the ordinary course of business by NNI. NNI states that Plaintiffs can publicly obtain this literature to the extent they wish to review it. NNI further states that responsive information can be found, to the extent it exists, in the custodial files for key custodians, including, but not limited to, Alan Moses, Jason Brett, and Lotte Knudsen. NNI further refers Plaintiffs to its IND and NDA productions, which include submissions of medical literature.

REQUEST NO. 46:

All reports, analyses, presentations, memoranda and other DOCUMENTS YOU are aware of that address, in whole or in part, whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer.

RESPONSE TO REQUEST NO. 46:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "all" reports, analyses, presentations, memoranda and other documents that NNI is "aware of." NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "address." NNI further objects to the extent this Request calls for information either not within NNI's possession, custody, or control and/or information that is a matter of public

record or otherwise as accessible to Plaintiffs as to NNI. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive information may be found, to the extent it exists, in the custodial for key custodians, including, but not limited to, Alan Moses, Jason Brett, and Lotte Knudsen.

REQUEST NO. 47:

To the extent not already produced in response to the preceding requests, all published and unpublished medical and scientific literature, reports, analyses, presentations, memoranda and other DOCUMENTS YOU are aware of that address whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES the proliferation of abnormal or dysfunctional beta cells; the proliferation of abnormal or dysfunctional alpha cells; the expansion of pancreatic ductal glands in rats; the formation of dysplastic lesions and chronic pancreatitis in mice; increases in the weight and/or size of the exocrine pancreas; the inhibition of apoptosis of pancreatic ductal cells; and the inhibition of apoptosis of pancreatic islet cells.

RESPONSE TO REQUEST NO. 47:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "all" published and unpublished medical and scientific literature, reports, analyses, presentations, memoranda, and other documents that NNI is "aware of." NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "address" and "medical and scientific literature." NNI further objects to the extent this Request calls for information either not within NNI's possession, custody, or control and/or information that is a matter of public record or otherwise as accessible to Plaintiffs

as to NNI. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent it is duplicative of Request Nos. 45 and 46.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its responses to Request Nos. 45 and 46.

REQUEST NO. 48:

To the extent not already produced in response to the preceding requests, all published and unpublished medical and scientific literature, reports, analyses, presentations, memoranda and other DOCUMENTS YOU are aware of that address the mechanism of action of VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor.

RESPONSE TO REQUEST NO. 48:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "all" published and unpublished medical and scientific literature, reports, analyses, presentations, memoranda, and other documents that NNI is "aware of." NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "address" and "medical and scientific literature." NNI further objects to the extent this Request calls for information either not within NNI's possession, custody, or control and/or information that is a matter of public record or otherwise as accessible to Plaintiffs as to NNI. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its responses to Request Nos. 45 and 46.

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REQUEST NO. 49:

To the extent not already produced in response to the preceding requests, all published and unpublished medical and scientific literature, reports, analyses, presentations, memoranda and other DOCUMENTS YOU are aware of that address the effect that VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor has on the pancreas.

RESPONSE TO REQUEST NO. 49:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "all" published and unpublished medical and scientific literature, reports, analyses, presentations, memoranda, and other documents that NNI is "aware of." NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "address" and "medical and scientific literature." NNI further objects to the extent this Request calls for information either not within NNI's possession, custody, or control and/or information that is a matter of public record or otherwise as accessible to Plaintiffs as to NNI. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its responses to Request Nos. 45 and 46.

REQUEST NO. 50:

All reports, memoranda and other DOCUMENTS that list and/or explain the criteria YOU use to determine whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer.

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RESPONSE TO REQUEST NO. 50:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of key custodians, including, but not limited to, Alan Moses, Michael Sacco, Jason Brett, Michelle Thompson, and Lotte Knudsen.

REQUEST NO. 51:

All medical and/or scientific literature that YOU have reported to the FDA or any other regulatory authorities that relates to the association between VICTOZA and pancreatitis and/or pancreatic cancer, including, but not limited to, all PSURs, PADERS/PAERS, and independent submissions.

RESPONSE TO REQUEST NO. 51:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "medical and/or scientific literature." NNI objects to this Request to the extent it requests information concerning regulatory authorities outside of the U.S. because they are not relevant to ligation in the U.S.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to NNI's IND and NDA productions, as identified in NNI's response to Request No. 2. NNI further states that documents submitted to the EMA can be found in the EMA regulatory files, which will be produced in this litigation through February 28, 2014 in searchable

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format and Plaintiffs will be in the same position as NNI to locate and identify any further responsive information within this category of documents.

NNI agrees to produce the EMA files for Victoza® only under the unique and specific facts of this case, namely, that NNI relies upon the EMA's July 2013 Assessment and the FDA and EMA's February 2014 Assessment as it relates to general causation. NNI maintains its position that regulatory filings with foreign agencies are irrelevant to product liability actions in the United States and should not generally be produced in these litigations.

REQUEST NO. 52:

To the extent not already produced in response to the preceding requests, produce all communications, analyses, expert analyses, safety board analyses, independent analyses, and/or meta analyses that pertain to, reference, or in any way discuss any of the medical and scientific literature and/or the preclinical, nonclinical, animal, human, observational and/or other studies referred to above with respect to whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer.

RESPONSE TO REQUEST NO. 52:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "*all* communications, analyses, expert analyses, safety board analyses, independent analyses, and/or meta-analyses that *pertain to, reference, or in any way* discuss *any* of the medical and scientific literature and/or the preclinical, nonclinical, animal human, observational or/other studies." NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to the extent this Request calls for information either not within NNI's possession, custody, or control and/or information that is a matter of public record or otherwise as accessible to Plaintiffs as to NNI. NNI objects to the Request to the extent it seeks

information protected by the attorney-client privilege and/or work product doctrine.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of NNI's key custodians, Alan Moses, Michael Sacco, Jason Brett, Michelle Thompson, Kathryn Owen, Yizhen Xu, and Lotte Knudsen.

COMMUNICATIONS REGARDING CAUSAL CONNECTION WITH PANCREATIC CANCER

REQUEST NO. 53:

All communications YOU have had with the author(s) of the medical and/or scientific literature referenced above with respect to whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 53:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "all communications" related to a voluminous body of "medical and/or scientific literature" sought by Plaintiffs that is not identified in this Request. NNI further objects to this Request as vague and ambiguous as it fails to define key terms, including "medical and/or scientific literature." NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of NNI's key custodians, Alan Moses, Michael Sacco, Jason Brett, Michelle Thompson, Kathryn Owen, Yizhen Xu, and Lotte Knudsen.

REQUEST NO. 54:

All emails, letters, reports, memoranda and other written communications YOU have had internally regarding whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatic cancer.

RESPONSE TO REQUEST NO. 54:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it requests NNI produce "all" emails, reports, memoranda, and other written communications. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of NNI's key custodians, Alan Moses, Michael Sacco, Jason Brett, Michelle Thompson, Kathryn Owen, Yizhen Xu, and Lotte Knudsen.

REQUEST NO. 55:

If YOU have made and/or requested label changes in the United States or elsewhere to add or strengthen warnings about the risks of pancreatitis and/or pancreatic cancer associated with VICTOZA at any time since YOU began to market VICTOZA, provide all DOCUMENTS, including emails, letters, reports, memoranda and other written communications, that YOU have sent to or received from the FDA and/or any applicable foreign country's regulatory authority in connection with each label change and/or request. This request to produce includes, without limitation, any PAS or CBE submitted by YOU to the FDA, and any response YOU have received from the FDA.

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RESPONSE TO REQUEST NO. 55:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to the extent this Request seeks information regarding foreign regulatory activities.

Subject to and without waiving the foregoing General and Specific Objections, NNI refers Plaintiffs to NNI's IND and NDA production, as identified in NNI's response to Request No. 2. NNI further refers Plaintiffs to its production of product labels and medication guides for Victoza® approved by the FDA produced with Bates-prefix "NNI-label."

REQUEST NO. 56:

All emails, letters, reports, memoranda and other written communications to or from any source discussing or referring to physician monitoring and/or testing for pancreatitis and/or pancreatic cancer associated with the use of VICTOZA.

RESPONSE TO REQUEST NO. 56:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks "all" emails, letters, reports, memoranda and other communications "to or from any source." NNI objects to the Request to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine. NNI further objects to this Request as vague and ambiguous because the term "physician monitoring" is undefined and renders the Request unintelligible.

REQUEST NO. 57:

The meeting minutes and any summaries of meeting minutes for each internal meeting at which YOU discussed whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer.

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RESPONSE TO REQUEST NO. 57:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request to the extent that it relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request as overly broad and unduly burdensome as it requests information for "each" internal meeting on this topic. NNI further objects to this Request to the extent "internal meeting" is not defined and is vague and ambiguous.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of key custodians, Alan Moses, Michael Sacco, Jason Brett, Michelle Thompson, Kathryn Owen, Yizhen Xu, and Lotte Knudsen. NNI further states that to the extent it identifies meeting minutes for the Liraglutide Safety Committee stored in a central location in the ordinary course of business, it will produce those documents.

REQUEST NO. 58:

All notes, recordings, handouts, materials and presentations YOU or YOUR employees are aware of that were made or obtained in connection with any meeting, conference or other event, internal or external, at which the subject of whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer was discussed.

RESPONSE TO REQUEST NO. 58:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome. NNI further objects to this Request as vague and ambiguous, as it fails to define key terms, including "meeting," "conference," "event," or "discussed." NNI further objects to this Request to the extent it seeks documents

not in NNI's possession, custody, or control. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer. NNI further objects to this Request to the extent it seeks "all" notes, recordings, handouts, materials, and presentations on the topic as unduly burdensome and overly broad.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of key custodians, including, but not limited to, Alan Moses, Jason Brett, and Lotte Knudsen.

REQUEST NO. 59:

If the sale of VICTOZA has ever been prohibited due to concerns that it may CAUSE pancreatitis and/or pancreatic cancer, produce all emails, letters, reports, memoranda and other written communications received by YOU addressing or discussing those concerns, and all emails, letters, reports, memoranda and other written communications prepared by YOU (whether sent or not sent) addressing or discussing those concerns.

RESPONSE TO REQUEST NO. 59:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks all emails, letters, reports, memoranda, and other written communications. NNI further objects to this Request to the extent it seeks documents regarding foreign regulatory activities.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that the sale of Victoza® has never been prohibited in the U.S. market due to concerns that it may cause pancreatic cancer or pancreatitis.

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INCRETIN SCIENCE AND SCIENTIFIC LITERATURE: BIAS/INFLUENCE/RELIABILITY

REQUEST NO. 60:

If any of YOUR employees, officers, directors, agents, contractors, key opinion leaders, members of speakers' bureaus, advisory board members, or scientific advisors have corresponded with or supplied information or data to any scientific journal regarding whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer, produce the correspondence, information and/or data.

RESPONSE TO REQUEST NO. 60:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define certain terms and phrases, including "key opinion leader," "member of speaker bureau," "advisory board member," and "scientific advisor." NNI further objects to the term "any scientific journal" as overly broad and unduly burdensome. NNI further objects to this Request to the extent it seeks information concerning non-NNI personnel. NNI further objects to this Request to the extent it seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent it seeks information concerning activities outside the United States. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of key custodians, including, but not limited to, Alan Moses, Jason Brett, and Lotte Knudsen.

REQUEST NO. 61:

If any of YOUR employees, officers, directors, agents, contractors, key opinion leaders, members of speakers' bureaus, advisory board members, or

scientific advisors have submitted a manuscript, case report, article described as an "advertisement," opinion piece or topic to any scientific journal regarding whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer, produce the material submitted.

RESPONSE TO REQUEST NO. 61:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define certain terms and phrases, including "key opinion leader," "member of speaker bureau," "advisory board member," and "scientific advisor." NNI further objects to this Request to the extent it seeks information concerning non-NNI personnel. NNI further objects to this Request to the extent it seeks information regarding products other than Victoza®. NNI further objects to the term "any scientific journal" as overly broad and unduly burdensome. NNI further objects to this Request to the extent it seeks information concerning activities outside the United States. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of key custodians, including, but not limited to, Alan Moses, Jason Brett, and Lotte Knudsen.

REQUEST NO. 62:

If any of YOUR employees, officers, directors, agents, contractors, key opinion leaders, members of speakers' bureaus, advisory board members, or scientific advisors have participated in or supplied information or data to any expert meeting, panel or committee investigating or reviewing whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer, produce the correspondence, data and other

DOCUMENTS supplied to, received from, or created by such meeting(s), panel(s) or committee proceedings.

RESPONSE TO REQUEST NO. 62:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous in that it fails to define certain terms and phrases, including "key opinion leader," "member of speaker bureau," "advisory board member," and "scientific advisor," "investigating or reviewing," and "expert meeting, panel or committee." NNI further objects to this Request as overly broad and unduly burdensome to the extent it seeks information related "to any expert meeting, panel or committee." NNI further objects to this Request to the extent it seeks information concerning non-NNI personnel. NNI further objects to this Request to the extent it seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent it seeks information concerning activities outside the United States. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of key custodians, including, but not limited to, Alan Moses, Jason Brett, and Lotte Knudsen.

REQUEST NO. 63:

If any of YOUR employees, officers, directors, agents, contractors, key opinion leaders, members of speakers' bureaus, advisory board members, or scientific advisors corresponded with or supplied information or data to any authors, medical journals, scientific journals, any other publications, any diabetes research or research funding organizations or persons affiliated with them, any scientific advisors, or any consultants about Dr. Susan Bonner Weir, Dr. Alexandra E. Butler, Dr. Peter C. Butler, Dr. David D. Dore, Dr. Daniel J.

Drucker, Dr. Michael Elashoff, Dr. Robert Elashoff, Dr. Edwin Gale, Dr. Rajesh Garg, Dr. Belinda Gier, Dr. Fred Gorlick, Dr. Steven Kahn, Dr. Jacqueline Koehler, Dr. Aleksey V. Matveyenko, Dr. Robert Ratner, Dr. Sonal Singh, or Dr. Jay S. Skyler, and/or about any of the work they have done or authored regarding incretin medications, produce the correspondence, information and/or data.

RESPONSE TO REQUEST NO. 63:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as vague and ambiguous as it fails to define certain terms and phrases, including "corresponded with or supplied information or data," "key opinion leader," "member of speaker bureau," "advisory board member," and "scientific advisor." NNI further objects to the term "any scientific journal" as overly broad and unduly burdensome. NNI further objects to this Request to the extent it seeks information concerning non-NNI personnel. NNI further objects to this Request to the extent it seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent it seeks information unrelated to the alleged risks and injuries at issue in this litigation. NNI further objects to this Request to the extent it seeks information concerning activities outside the United States. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of key custodians, including, but not limited to Alan Moses, Jason Brett, and Lotte Knudsen.

REQUEST NO. 64:

To the extent not already produced in response to the preceding requests, all emails, letters, reports, memoranda and other written communications with authors, medical journals, scientific journals, any other publications, any diabetes research

or research funding organizations or persons affiliated with them, any scientific advisors, or any consultants about whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer.

RESPONSE TO REQUEST NO. 64:

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Request as overly broad and unduly burdensome to the extent it requests "all" emails, letters, reports, memoranda and other written communications, with multiple enumerated individuals. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to this Request to the extent it seeks information concerning activities outside the United States. NNI further objects to this Request to the extent that it suggests there is a causal connection between Victoza® and pancreatic cancer.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that responsive documents can be found, to the extent they exist, within the custodial files of key custodians, including, but not limited to Alan Moses, Jason Brett, and Lotte Knudsen.

REQUEST NO. 65:

All DOCUMENTS that constitute or discuss compensation, honoraria, grants, scholarships or gifts, whether offered or actually paid, to individuals or institutions for work (including, without limitation, work done on preclinical studies, nonclinical studies, animal studies, human studies, other research, or the authorship of articles) concerning whether VICTOZA or any other GLP 1 agonist or DPP 4 inhibitor CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer. Include in YOUR response, without limitation, all such DOCUMENTS pertaining to Dr. Susan Bonner Weir, Dr. David D. Dore, Dr. Daniel J. Drucker, Dr. Rajesh Garg, Dr. Fred Gorlick, Dr. Steven Kahn,

Dr. Jacqueline Koehler, Dr. Robert Ratner, Dr. Jay S. Skyler, and/or the companies and/or organizations that employ them.

RESPONSE TO REQUEST NO. 65:

NNI incorporates as if fully set forth herein, the General Objections by reference. NNI further objects to the extent that this Request relates to or seeks information regarding products other than Victoza®. NNI further objects to the extent that this Request seeks documentation not maintained by NNI in the regular and ordinary course of business. NNI further objects to this Request to the extent it seeks documentation related to compensation, honoraria, grants, scholarships or gifts that were not offered or actually paid by NNI or NNI officers, directors, agents, or employees.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI states that to the extent responsive information for the individuals identified above can be identified from a reasonable search and retrieved from a central location as kept in the ordinary course of business, NNI will produce responsive information.

DOCUMENT RETENTION, DESTRUCTION AND ARCHIVING

REQUEST NO. 66:

All of YOUR DOCUMENT retention, destruction and archiving policies that apply to VICTOZA preclinical, nonclinical, animal, human and/or observational studies; other studies addressing, in whole or in part, whether VICTOZA CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer; VICTOZA ADVERSE EVENTS; and any other DOCUMENTS addressing whether VICTOZA CAUSES and/or is capable of CAUSING pancreatitis and/or pancreatic cancer.

RESPONSE TO REQUEST NO. 66:

NNI incorporates as if fully set forth herein, the General Objections by reference. NNI objects to this Request as overly broad and unduly burdensome.

NNI further objects to this Request as it is not relevant to general causation issues.

Subject to and without waiving or otherwise limiting the foregoing General and Specific Objections, NNI refers Plaintiffs to its SOP production for responsive information, to the extent it exists.

PRIVILEGE LOG

REQUEST NO. 67:

To the extent that YOU have withheld any DOCUMENTS responsive to any of these requests under any claim of privilege, produce a privilege log as required by Fed. R. Civ. P. 26.

RESPONSE TO REQUEST NO. 67:

At the request of Plaintiffs, a privilege protocol was agreed to be considered and negotiated among the Parties. NNI, in connection with the co-defendants in this litigation, provided Plaintiffs with a draft privilege protocol for review several months ago and have not received a response. NNI objects to producing a privilege log until a protocol is agreed upon.

Dated: May 8, 2014

DLA PIPER LLP (US)

By: /s/ Raymond M. Williams

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